

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

IN RE:
SANFORD AMEY
DEBTOR

CHAPTER 13 PROCEEDING:
21-21038-C-13

MOTION TO DISMISS OR CONVERT

This motion seeks an order that may adversely affect you. If you oppose the motion, you should immediately contact the moving party to resolve the dispute. If you and the moving party cannot agree, you must file a response and send a copy to the moving party. You must file and serve your response within 21 days of the date this was served on you. Your response must state why the motion should not be granted. If you do not file a timely response, the relief may be granted without further notice to you. If you oppose the motion and have not reached an agreement, you must attend the hearing. Unless the parties agree otherwise, the court may consider evidence at the hearing and may decide the motion at the hearing.

A hearing will be conducted on this matter on **April 14, 2021** at **11:00 am** in U.S. Bankruptcy Court located at:

US Bankruptcy Court, 1133 N. Shoreline Blvd., 2nd Floor, Corpus Christi, TX 78401

Represented parties should act through their attorney.

Cindy Boudloche, Trustee, moves to to dismiss the case or convert it to one under Chapter 7 pursuant to Fed. R. Bankr. P. 1017 and Local Bankruptcy Rule 1017-2 for the following reasons:

1. Debtor has caused unreasonable delay that is prejudicial to creditors (11 U.S.C. Sec 1307 (c)(1)) and specifically, Debtor has failed to:

- a) Timely file necessary amendments to his/her Chapter 13 Plan, schedules or statement of Financial Affairs as follows:
- Chapter 13 Plan;
 - Schedule A;
 - Schedule B;
 - Schedule C;
 - Schedule I;
 - Schedule J;
 - Statement of Financial Affairs;
- b) File and/or provide a copy to the Trustee of federal income tax returns or affidavit stating that Debtors are not required to file tax returns;
- c) Provide the Trustee with a copy of his/her most recent pay stub or other verification of current income;

WHEREFORE the Trustee prays that the case be dismissed or converted to Chapter 7, whichever shall be determined in the best interest of creditors.

Dated: March 11, 2021

Respectfully Submitted:

/s/ Cindy Boudloche

CINDY BOUDLOCHE, Trustee
555 N. Carancahua Ste 600
Corpus Christi, TX 78401-0823
(361) 883-5786 phone
(361) 888-4126 fax

CERTIFICATE OF SERVICE

I Certify that on or about March 11, 2021, a copy of the foregoing pleading was served electronically on all parties requesting electronic notice or by United States Mail to the Debtor, Debtor's Counsel and all parties listed below:

/s/ Cindy Boudloche

Cindy Boudloche, Trustee

CASE NO: 21-21038-C-13

SANFORD AMEY

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Parties Requesting 2002 Notice

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